



1. The date on which discovery closes is November 2, 2012 (Dkt. No. 67);

2. The Parties have reached a settlement of the claims on behalf of the 1681k Notice and Obsolete Information Classes in this case;

3. The Parties continue to negotiate an individual settlement on behalf of Plaintiff Salazar for his claim under 15 U.S.C. § 1681e(b), and are optimistic that they will soon complete those negotiations;

4. Plaintiffs' deadline by which to file their Motion for Class Certification is also November 2 (*id.*);

5. The Parties had scheduled depositions—including those of the Plaintiffs and two third parties—for the weeks of October 22 and October 29, 2012, but the progress made in recent settlement negotiations has made these depositions unnecessary;

6. Once the Parties have executed the definitive class settlement agreement memorializing their settlement of the claims being brought by the 1681k Notice and Obsolete Information Classes, completed negotiations of Plaintiff Salazar's individual claim, and conducted any remaining confirmatory discovery, the Parties will have definitively settled all claims in this case and will then be able

to present a comprehensive settlement to the Court for preliminary approval as opposed to piecemeal settlements;

7. After executing the definitive class settlement agreement, the Parties will also conduct additional depositions of LexisNexis witnesses, to verify the populations of the Classes, examine the FCRA procedures involved, and ensure that the settlement is in the best interest of the Classes; and

8. The Parties believe that their negotiations, confirmatory discovery, and motion for preliminary approval can be completed within 45 days.

Accordingly, the Parties respectfully request that the Court stay all pending deadlines for 45 days so that the Parties may complete their settlement negotiations and attendant discovery, and briefing of those settlements for presentation to the Court for formal approval. A proposed order granting this Motion has been filed concurrently herewith.

Dated: October 30, 2012.

We consent to the relief requested in this Motion:

/s/ Michael A. Caddell  
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**CERTIFICATE OF COMPLIANCE**

The foregoing document complies with the typeface requirements of Local Rule 5.1C and the type style requirements of Local Rule 5.1C(3) using Times New Roman 14 point font.

/s/ Michael A. Caddell

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following:

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Dated: October 30, 2012.

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